

EXHIBIT 3
to Plaintiff's Motion to Compel
Discovery

From: Cupar, David B. <dcupar@mcdonaldhopkins.com>
Sent: Wednesday, April 5, 2023 1:59 PM
To: Kasi Chadwick; lteran@strategiclegalcounseling.com
Cc: Courtney Ervin; Felicia M. O'Loughlin; Cavanagh, Matthew J.; Meeks, Susan
Subject: RE: URZ Trendz - Subpoena & Telephone Call

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Mr. Teran,

My name is Dave Cupar and I am lead counsel for Spectrum in this counterfeit litigation. I just left you a detailed voice mail on scheduling a meet and confer based on URZ's refusal to respond with any documents, ESI or information to Spectrum's subpoena.

Please let us know at your earliest convenience what times you're available for a meet and confer on Thursday or Friday this week. We would like to resolve this with you without the need for Court intervention compelling URZ to comply with the subpoena served on it.

Thanks,
Dave

David B. Cupar
Member

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From: Kasi Chadwick <kchadwick@hicks-thomas.com>
Sent: Tuesday, April 4, 2023 11:20 AM
To: lteran@strategiclegalcounseling.com
Cc: Courtney Ervin <cervin@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>
Subject: RE: URZ Trendz - Subpoena & Telephone Call

Mr. Teran—

Following up. When can we conference URZ's objections to the subpoena? I'm generally available tomorrow and Thursday. Please let me know a good time to speak by phone.

Thanks,
-Kasi

From: Kasi Chadwick
Sent: Tuesday, March 28, 2023 10:06 AM
To: lteran@strategiclegalcounseling.com
Cc: Courtney Ervin <cervin@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>
Subject: RE: URZ Trendz - Subpoena & Telephone Call

Yes; I likewise called you a number of times without being able to connect. As previously requested, let's set a date/time certain when we can speak.

Please provide times on April 3. Enjoy your vacation.

From: lteran@strategiclegalcounseling.com <lteran@strategiclegalcounseling.com>
Sent: Thursday, March 23, 2023 3:15 PM
To: Kasi Chadwick <kchadwick@hicks-thomas.com>
Cc: Courtney Ervin <cervin@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>
Subject: Re: URZ Trendz - Subpoena & Telephone Call

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Kasi,

As you know, I have called you multiple times in the last 2 weeks to discuss this matter. But for some reason we were unable to connect. Unfortunately, I will be on vacation from March 24 to April 3. Let me know when in the week of April 3 you are available to meet and confer. At first glance, it is our position that the trademark you are asserting is invalid for various reasons, including but not limited to the illegality of your client's products and also existing marks that have been used years before your client. I am glad to discuss these matters in detail. Let me know when in the week of April 3 you can meet and confer.

Thank you

Louis F. Teran
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Sent from my Verizon, Samsung Galaxy smartphone

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From: Kasi Chadwick <kchadwick@hicks-thomas.com>
Sent: Thursday, March 23, 2023, 10:58 AM
To: Louis F. Teran <lteran@strategiclegalcounseling.com>
Cc: Courtney Ervin <cervin@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>
Subject: RE: URZ Trendz - Subpoena & Telephone Call

Mr. Teran—

First, please let me know your availability to meet and confer on Tuesday afternoon (3.28) or Wednesday (3.29) of next week. Respectfully, you should rethink the approach of objecting without responding to this subpoena, and instead have your client respond to it completely and promptly. By way of background, the District Court in Texas ordered the issuance of subpoenas to promptly get to the bottom of this counterfeiting scheme. If URZ does not fully comply promptly, Spectrum will file a motion to compel.

The subpoena is reasonable and tailored to seek substantive information relating to a very serious counterfeiting issue. Indeed, other parties have responded promptly and completely to nearly identical subpoenas. It is in URZ's best interest to cooperate fully and promptly. Otherwise, Spectrum disagrees with your objections and refusal to produce any documents or ESI, and the obvious concern is that URZ is objecting to delay or obfuscate legal discovery from occurring.

Second, please confirm that URZ has not destroyed any documents, ESI or communications since service of Spectrum's subpoena, and that URZ has a litigation hold in place to ensure proper compliance with the law.

We look forward to resolving this issue with you in short order.

Thank you,
-Kasi

From: Louis F. Teran <lteran@strategiclegalcounseling.com>
Sent: Thursday, March 23, 2023 2:00 AM
To: Kasi Chadwick <kchadwick@hicks-thomas.com>
Cc: Courtney Ervin <cervin@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>
Subject: RE: URZ Trendz - Subpoena & Telephone Call

CAUTION: **This email
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from outside of the organization.

Please find attached the URZ Trendz, LLC's objections to your subpoena.
Feel free to contact me with any comments or questions.

Thank you

Louis F. Teran
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From: Kasi Chadwick <kchadwick@hicks-thomas.com>

Sent: Friday, March 17, 2023 9:16 AM

To: iteran@strategiclegalcounseling.com

Cc: Courtney Ervin <cervin@hicks-thomas.com>; Felicia M. O'Loughlin <foloughlin@hicks-thomas.com>

Subject: URZ Trendz - Subpoena & Telephone Call

Mr. Teran—

It appears we are missing each other via telephone. I left you a voicemail earlier this week in response to your telephone call.

Please let me know when a good time would be to speak. I presume you are calling regarding the attached subpoena.

Thanks,
-Kasi



Kasi Chadwick
Partner

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